

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE FRANCISCO SANTA ROSADO
JANIRA VELAZQUEZ LOZADA

DEBTORS

CASE NO. 15-01092-ESL

CHAPTER 13

**DEBTORS' REPLY TO TRUSTEE'S MOTION TO DISMISS, DOCKET #57,
TO THE HONORABLE COURT:**

COME NOW, JOSE FRANCISCO SANTA ROSADO and JANIRA VELAZQUEZ LOZADA, debtors in the above captioned case, through the undersigned attorney, and very respectfully state and pray as follows:

1. On May 12, 2016, the Chapter 13 Trustee filed a Motion to Dismiss, docket #55, stating that the debtors have defaulted in their Plan payments.

2. The debtors met with the undersigned attorney regarding this matter and respectfully submit that they did incur in Plan payment arrears due to certain economic problems.

3. The debtors respectfully submits that on June 1, 2016, they filed a post confirmation modification of Chapter 13 Plan, docket #61, in order to cure the Plan arrears owed to the Trustee.

WHEREFORE, debtors respectfully request this Honorable Court deny the Trustee's motion to dismiss, docket #57, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13 Trustee, I also certify that a copy of this motion was sent via US Mail to the debtors to their address of record.

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RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7th day of June, 2016.

/s/ Roberto A. Figueroa Colón
ROBERTO A. FIGUEROA COLON
USDC #300105

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